

MITIGATING FACTORS

1. Dzhokhar Tsarnaev was 19 years old at the time of the offenses.
2. Dzhokhar Tsarnaev had no prior history of violent behavior.
3. Dzhokhar Tsarnaev acted under the influence of his older brother.
4. Whether because of Tamerlan's age, size, aggressiveness, domineering personality, privileged status in the family, traditional authority as the eldest brother, or other reasons, Dzhokhar Tsarnaev was particularly susceptible to his older brother's influence.
5. Dzhokhar Tsarnaev's brother Tamerlan planned, led, and directed the Marathon bombing.
6. Dzhokhar Tsarnaev's brother Tamerlan was the person who shot and killed Officer Sean Collier.
7. Dzhokhar Tsarnaev would not have committed the crimes but for his older brother Tamerlan.
8. Dzhokhar Tsarnaev's teachers in elementary school, middle school, and high school knew him to be hardworking, respectful, kind, and considerate.
9. Dzhokhar Tsarnaev's friends in high school and college knew him to be thoughtful, caring, and respectful of the rights and feelings of others.
10. Dzhokhar Tsarnaev's teachers and friends still care for him.
11. Dzhokhar Tsarnaev's aunts and cousins love and care for him.
12. Mental illness and brain damage disabled Dzhokhar Tsarnaev's father.

13. Dzhokhar Tsarnaev was deprived of needed stability and guidance during his adolescence by his father's mental illness and brain damage.
14. Dzhokhar Tsarnaev's father's illness and disability made Tamerlan the dominant male figure in Dzhokhar's life.
15. Dzhokhar Tsarnaev was deprived of the stability and guidance he needed during his adolescence due to his mother's emotional volatility and religious extremism.
16. Dzhokhar Tsarnaev's mother facilitated his brother Tamerlan's radicalization.
17. Tamerlan Tsarnaev became radicalized first, and then encouraged his younger brother to follow him.
18. Dzhokhar Tsarnaev's parents' return to Russia in 2012 made Tamerlan the dominant adult in Dzhokhar's life.
19. If he is not sentenced to death, Dzhokhar Tsarnaev will be imprisoned for the rest of his life without the possibility of release
20. Dzhokhar Tsarnaev is highly unlikely to commit, incite, or facilitate any acts of violence in the future while serving a life-without-release sentence in federal custody.
21. The government has the power to severely restrict Dzhokhar Tsarnaev's communications with the outside world.
22. Dzhokhar Tsarnaev has expressed sorrow and remorse for what he did and for the suffering he caused.

23. One or more of the jurors find the following additional mitigating factors that weigh against imposition of the death penalty:
